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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
ITS NOTICE OF SUBMISSION OF
DEPOSITION DESIGNATION
PACKETS (DKT. 2606)**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Portions of Its Notice of Submission of Deposition Designation Packets (Dkt. 2606).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Appendices 6-11 to Waymo's Notice of Submission	Entire Documents

3. I understand that Appendices 6-11 contain highly confidential information relating to Uber's business plans, LiDAR development, and technical information. This information has been maintained as confidential. Disclosure of this information would allow Uber's competitors to obtain insight into Uber's strategies and technical development, to the detriment of Uber's competitive standing.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Response and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of February, 2018 at San Francisco, California.

/s/ Michelle Yang

Michelle Yang